

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MONSANTO COMPANY and
MONSANTO TECHNOLOGY, LLC.
Plaintiff,

V.

ZEFERINO SAUCEDA
Defendant.

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CIVIL ACTION NO.
4:10CV2249CEJ

CHARLES DUNN'S MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS
ATTORNEY

TO THE HONORABLE JUDGE OF SAID COURT:

CHARLES DUNN asks this court to allow him to withdraw as the attorney for the Defendant, Zeferino Saucedo.

A. Introduction

1. Plaintiff is MONSANTO COMPANY and MONSANTO TECHNOLOGY, LLC.;
Defendant is ZEFERINO SAUCEDA.

2. Plaintiff sued Defendant for Patent Infringement.

B. Argument

3. There is good cause for this Court to grant the motion to withdraw because Defendant has failed to comply with the terms and conditions of his contract of employment with Charles Dunn.

4. Allowing CHARLES DUNN to withdraw as attorney in charge will not delay these proceedings because discovery is in the early stages.

5. The client does not oppose this withdrawal but has not yet selected a substitute attorney.

6. CHARLES DUNN has delivered a copy of this motion to Defendant ZEFERINO SAUCEDA and notified him in writing of the motion, by both certified and regular mail.

7. Defendant, ZEFERINO SAUCEDA'S last known address and telephone number are P.O. Box 335, Slaton, Texas 79364, 806-632-2873. His work address is West Texas Seed-Delinting, Inc., 15003 FM 400, Slaton, Texas 79364.

8. The following is a list of all pending settings and deadlines in this case:

November 7, 2011- Expert Witnesses and Reports Deadline
January 6, 2012- Expert Witness Deposition Deadline
February 6, 2012- Rebuttal Expert Witnesses and Reports Deadline
April 9, 2012- Rebuttal Expert Witness Deposition Deadline
July 31, 2012- Discovery Deadline
April 16, 2012-Alternative Dispute Resolution
August 6, 2012- Motions to Dismiss, Motion for Summary Judgment, Motions for Judgments on the pleadings deadline.
October 29, 2012- Parties ready for Trial.

9. Mr. Saucedo has received a copy of the deadlines in this case.

C. Conclusion

10. For these reasons, CHARLES DUNN asks this court to grant his motion to withdraw.

Respectfully submitted,

By: 

Charles Dunn

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing documents has been forwarded in accordance with the Federal Rules of Civil Procedure on this 30 day of August, 2011, to all counsel of record.



Charles Dunn